

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.  
Ronald CHAVEZ

Case No. 5:19-MJ-3

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 30, 2018 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1324

*Offense Description*

Did unlawfully transport, attempt to transport, and conspire to transport two undocumented alien(s) by means of transportation and otherwise within the Southern District of Texas, knowing or in reckless disregard of the fact that said alien(s) had come to, entered, or remained in the United States in violation of law, and transported or moved or attempted to transport or move or conspired to transport or move said alien(s) within the United States by means of transportation or otherwise in furtherance of such violation of law;

This criminal complaint is based on these facts:

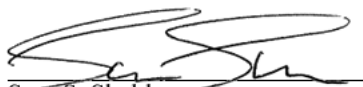
Continued on Affidavit

☒ Continued on the attached sheet.

/S/Jose Mangual

Complainant's signature

Complainant Jose Mangual  
sworn and attested before me  
on January 2, 2019,  
at Laredo, Texas.

  
Sam S. Sheldon  
United States Magistrate Judge

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA  
V.**

**CRIMINAL COMPLAINT**

Ronald CHAVEZ

Case Number:

1. On December 30, 2018, at approximately 7:40 p.m., Border Patrol Agents (BPAs) assigned to the United States Border Patrol Checkpoint, encountered a red Jetta Volkswagen with three visible subjects in the vehicle.
2. BPAs began conducting an immigration inspection on the driver, later identified as Ronald Chavez, if he was a United States Citizen to which he answered, "yes". BPAs then questioned the passenger Olivia Torres - Chanes asking if she had any identification she stated no. At this time the vehicle was instructed to drive to the secondary inspection at Charlie 29 Checkpoint. After further investigation was conducted on Olivia Torres -Chanes, it was determined that she was a citizen of Mexico, illegally in the United States with no immigration documents that would allow her to legally be or remain in the United States. At secondary inspection BPAs asked the second passenger Jose Flores Sanchez for identification and was handed a Mexican passport. BPA then asked if the subject if he was here illegally and Jose Flores Sanchez stated yes. At that time Chavez and both passengers were taken inside for further processing.
3. Ronald Chavez waived his rights and did not request to have a lawyer present during questioning and provided a sworn statement. Chavez stated that he didn't know that Olivia Torres - Chanes and Jose Flores Sanchez were in the United States illegally. Chavez stated that they all were from Houston, Texas and knew each other from church. He stated they drove down to Laredo , Texas to vacation and visit different locations.
4. Jose Flores Sanchez, a citizen of Mexico, agreed to provide a sworn statement. Flores Sanchez freely stated that he crossed and paid a man in Mexico \$2000.00 to be smuggled into the United States. Once in the United States Flores Sanchez stated he waited for one day in a house with his wife and several other people. He was then transported to several different houses in the next several days. He was then asked with his wife to get into a dark truck and was taken to the Walmart parking lot in Mcallen, Texas. Once at the Walmart parking lot they were instructed to get into a red Jetta Volkswagen. They were then transported from Mcallen , Texas to Laredo, Texas where they were apprehended at the Charlie 29 Checkpoint.
5. Olivia Torres Chanes, a citizen of Mexico, agreed to provide a sworn statement. Torres Chanes freely stated that she crossed and her husband paid \$2000.00 in Mexico to be smuggled into the United States. Once in the United States Torres Chanes stated she waited for one day in a house with her husband and several other people. She was then transported to several different houses in the next several days. She was then asked with her husband to get into a dark truck and was taken to the Walmart parking lot in Mcallen, Texas. Once at the Walmart parking lot they were instructed to get into a red Jetta Volkswagen. They were then transported and from Mcallen , Texas to Laredo, Texas where they were apprehended at the Charlie 29 Checkpoint.

SUBSCRIBED and SWORN to before me this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Signature of Judicial Officer

\_\_\_\_\_  
Signature of Complaint